

# FLAVORCHEM INT. INC. – NAQADA PACIFIC

## PETITON TO USDA INCLUSION OF

### CHOCOLATE FLAVOR (NATURALLY FORTIFIED)

### IN NOP NATIONAL LIST

DATE SUBMITTED:

Submitted in duplicate to:  
**National Organic Standards Board,**  
 c/o Robert Pooler, Agricultural Marketing Specialist,  
 USDA/AMS/TM/NOP, Room 2510-So., Ag Stop 0268, P.O. Box 96456,  
 Washington, D.C. 20090-6456.  
 Phone: 202/720-3252. Fax: 202/205-7808.  
 e-mail: [nlpetition@usda.gov](mailto:nlpetition@usda.gov).

What Are the Substances for Which a Petition May be Submitted?

Only single substances or ingredients may be petitioned for evaluation. Formulated products cannot appear on the National List. Substances that appear on USDA's current Proposed National List, 65 Fed. Reg.13626-13628 (2000), should not be petitioned for inclusion on the National List.

ALL GUIDING DOCUMENTS AVAILABLE AT:

[HTTP://WWW.AMS.USDA.GOV/NOP/PETITION/PETITIONHOME.HTML](http://www.ams.usda.gov/nop/petition/petitionhome.html)

1	Petition Category	Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic" or made with organic (specified ingredients)
2	Substance common name:	Chocolate Flavor (Naturally Fortified)
3	Manufacturer's name, address and telephone number:	Flavorchem International Inc. 445 Milner Ave. #7-11 Toronto, Ontario M1B 2K4
4	Intended or current use of substance:	Natural Flavors (Chocolate) are used as ingredients in Food, Beverage, Confectionary, baked goods, pharmaceuticals etc.
5	List the "mode of action" of the substance:	N/A
6	Substance source:	Natural Flavors consist of natural chemicals as approved for use World Wide in food manufacturing and conform to the Food Chemical Codex.
7	Substance processing procedure from basic component(s) to final product.*	Natural Chemicals are mixed together to create a distinct flavor, resulting in a finished Natural Flavor.
8	Summary of available previous reviews by State or private certification programs or other:	N/A
9	Information re EPA,	All natural flavors conforms to GRAS/USDA and FCC

Decision Sheets  
 April 1, 2004

	FDA and State regulatory authority registrations including reg numbers:	
10	Chemical abstract Service (CAS) number or other numbers:	The ingredients used in this flavor have a CAS number.
11	Substance's physical properties and chemical mode of action; (a) chemical interaction (b) toxicity and environmental persistence (c) impacts of manufacture	(a) n/a (b) n/a (c) n/a
12	MSDS sheet:	N/A
13	National Institute of Environmental Health Studies.	N/A
14	Comprehensive substance research reviews and bibliographies including contrasting positions:	N/A
15	Petition Justification Statement:	One of our five senses is taste. Just about everything we eat and drink contains some flavor in it. Without natural flavors a lot of finished products (foods) would be affected.

\*Petitioners with concerns for confidential business information can follow the guidelines in the Instructions for Submitting Confidential Business Information (CBI) listed in #13.  
<http://www.ams.usda.gov/nop/NationalList/PetitionProcess.html>

Decision Sheet  
April 1, 2005

Nov. 25, 2005 1:32PM

No. 7070 P. 20/33

Evaluation Criteria for Substances added to the National List

Category 1. Adverse impacts on humans or the environment?

Substance: Chocolate Favor (Naturally Fortified)

Question	Yes	No	N/A	Documentation (FDA, petition, regulatory agency, other)
1. Are there adverse effects on environment from manufacture, use, or disposal? [§205.600 b.2]			N/A	
2. Is there environmental contamination during manufacture, use, misuse, or disposal? [§6518 m.3]			N/A	
3. Is the substance harmful to the environment? [§6517c(1)(A)(i); 6517(c)(2)(A)i]			N/A	
4. Does the substance contain List 1, 2, or 3 inerts? [§6517 c (1)(B)(ii); 205.601(m)2]			N/A	
5. Is there potential for detrimental chemical interaction with other materials used? [§6518 m.1]			N/A	
6. Are there adverse biological and chemical interactions in agro-ecosystem? [§6518 m.5]			N/A	
7. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§6518 m.5]			N/A	
8. Is there a toxic or other adverse action of the material or its breakdown products? [§6518 m.2]			N/A	
9. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§6518 m.2]			N/A	
10. Is there any harmful effect on human health? [§6517 c (1)(A)(i) ; 6517 c(2)(A)i; §6518 m.4]				No.
11. Is there an adverse effect on human health as defined by applicable Federal regulations? [205.600 b.3]				No.
12. Is the substance GRAS when used according to FDA's good manufacturing practices? [§205.600 b.5]				All natural flavors conform to GRAS
13. Does the substance contain residues of heavy metals or other contaminants in excess of FDA tolerances? [§205.600 b.5]				No.

**Category 2. Is the Substance Essential for Organic Production?**

Substance Chocolate Flavor (Naturally Fortified)

Question	Yes	No	N/A	Documentation (TAP, petition, regulatory agency, other)
1. Is the substance formulated or manufactured by a chemical process? [6502 (21)]				Natural Chemicals are mixed together to create a distinct flavor, resulting in a finished Natural Flavor. Every Natural flavor contains it's own formula of Natural Chemicals.
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)]			N/A	
3. Is the substance created by naturally occurring biological processes? [6502 (21)]			N/A	
4. Is there a natural source of the substance? [205.600 b.1]			N/A	
5. Is there an organic substitute? [205.600 b.1]		X		
6. Is the substance essential for handling of organically produced agricultural products? [205.600 b.6]	X			
7. Is there a wholly natural substitute product? [6517 c (1)(A)(ii)]		X		
8. Is the substance used in handling, not synthetic, but not organically produced? [6517 c (1)(B)(iii)]	X			
9. Is there any alternative substances? [6518 m.6]		X		
10. Is there another practice that would make the substance unnecessary? [6518 m.6]		X		

<sup>1</sup>If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

**Category 3. Is the substance compatible with organic production practices?**

Substance Chocolate Flavor (Naturally Fortified)

Question	Yes	No	N/A	Documentation (TAP, petition, regulatory agency, other)
1. Is the substance compatible with organic handling? [§205.600 b.2]	X			
2. Is the substance consistent with organic farming and handling? [§6517 c (1)(A)(iii); 6517 c (2)(A)(ii)]			N/A	
3. Is the substance compatible with a system of sustainable agriculture? [§6518 m.7]			N/A	
4. Is the nutritional quality of the food maintained with the substance? [§205.600 b.3]	X			
5. Is the primary use as a preservative? [§205.600 b.4]		X		
6. Is the primary use to recreate or improve flavors, colors, textures, or nutritive values lost in processing (except when required by law, e.g., vitamin D in milk)? [205.600 b.4]	X			
7. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:		X		
a. copper and sulfur compounds;		X		
b. toxins derived from bacteria;		X		
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		X		
d. livestock parasiticides and medicines?		X		
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		X		

<sup>1</sup>If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

# FLAVORCHEM<sup>TM</sup>

INTERNATIONAL INC.

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Canada, M1B 2K4  
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Web: www.flavorcheminc.ca

## *Fax or Memo*

To: Robert Pooler

Company: National Organic Standard

Fax #: 202-205-7808



From: Csilla

Pages: 33

Date: November 25, 2005

Dear Robert,

Please find following the Petition for inclusion in the NOP National List for the following ingredients:

Chocolate Flavor (Naturally Fortified)  
Strawberry Flavor (Naturally Fortified)  
Vanilla Type Flavorchem Int. Inc.  
Caramel Color  
Food Color (Elderberry Juice Concentrate)  
Magnesium Carbonate

Regards,

A handwritten signature in black ink, appearing to read 'Csilla Stewart', with a long, sweeping horizontal line extending to the right.

Csilla Stewart  
Quality Auditor

